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ORIGINAL

**USWEST**

Elridge A. Stafford  
Executive Director-  
Federal Regulatory

EX PARTE OR LATE FILED

EX PARTE

February 3, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

RECEIVED

FEB - 3 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: CC Docket No. 99-200, Number Resource Optimization

Dear Ms. Salas:

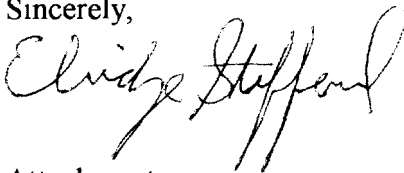
Please be advised that Stephanie Boyett-Colgan and the undersigned, representing U S WEST *Wireless*, LLC, met today with David Furth, Blaise Scinto and Peter Wolfe of the Wireless Telecommunications Bureau and Yog Varma, Diane Griffin Harmon and Les Selzer of the Common Carrier Bureau to discuss issues concerning the above-referenced proceeding. The attached document was distributed at the meeting and used as the basis of the discussion.

In accordance with Section 1.1206(b)(2) of the Commission's rules, the original and one copy of this letter and attachment are being filed with your office for inclusion in the public record of this proceeding.

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is attached for this purpose.

Please contact me if you have any questions concerning this matter.

Sincerely,



Attachment

cc: David Furth  
Diane Griffin Harmon  
Blaise Scinto  
Les Selzer  
Yog Varma  
Peter Wolfe

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**U S WEST *Wireless*, LLC**

**Optimization of Numbering Resources**

**CC Docket Number 99-200**

**•Stephanie L. Boyett-Colgan**

**•Elridge A. Stafford**

**February 3, 2000**

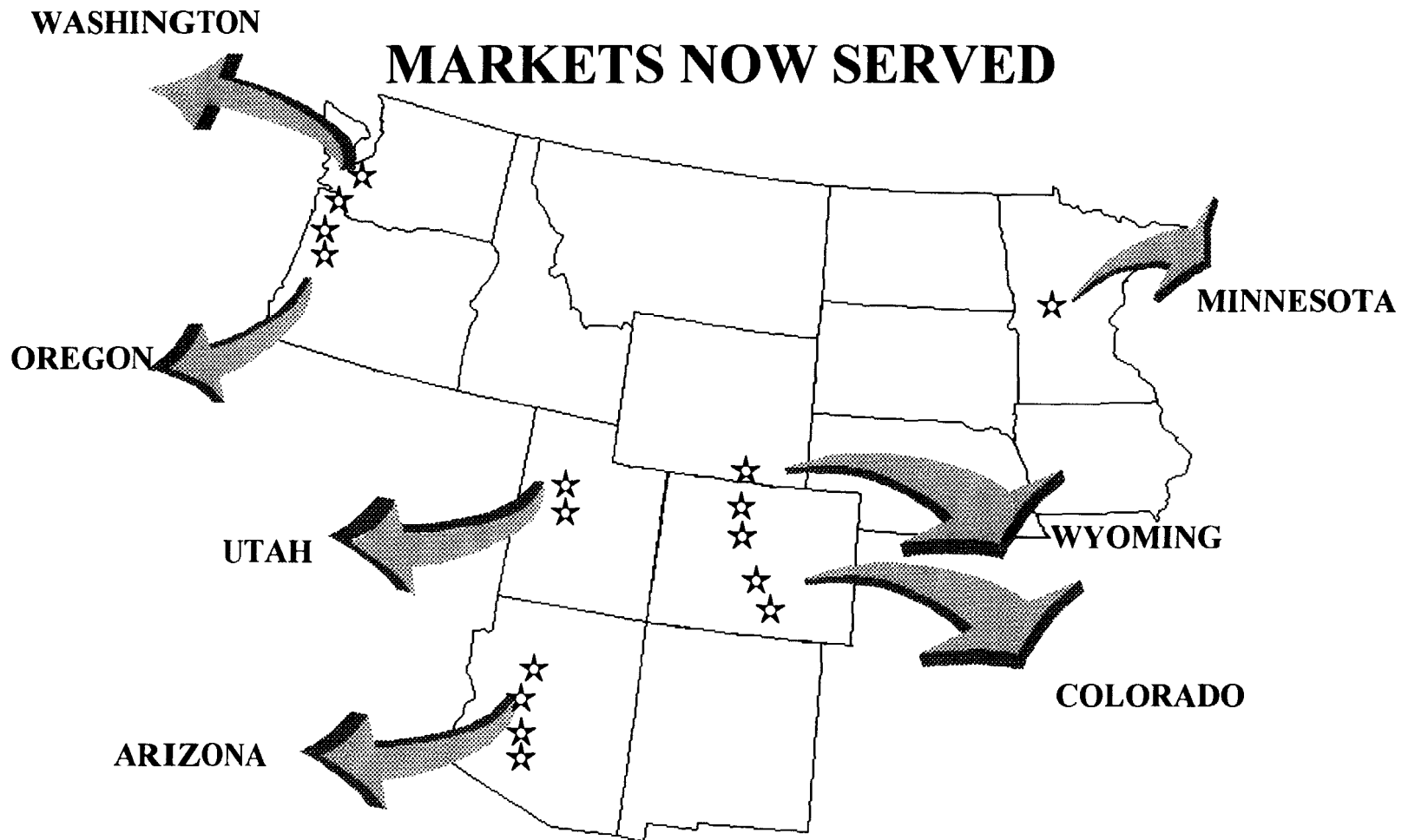
U S WEST *Wireless*, LLC

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## **USWW BACKGROUND**

- The CMRS affiliate of U S WEST Communications, Inc.
- Won 10 MHz licenses in 53 BTA markets in the PCS D & E auctions
- Beginning in late 1997 to present, has launched service in 7 metropolitan markets/corridors.
- 2000 plan: expand service in current markets and launch service in 4 additional states

# U S WEST *Wireless*, LLC



## **NUMBERING OPTIMIZATION**

- A national numbering regime is necessary.
  - Disparate state conservation plans are inefficient and may be counterproductive.
- Many telecommunications carriers operate their businesses with a national or regional focus.
- USWW, like many other wireless carriers, has licenses that do not necessarily follow state boundaries.

**NUMBERING OPTIMIZATION (Cont'd)**

- The Commission's national numbering regime should take the form of utilization standards.
- The Commission need not, and should not, mandate the means for achieving utilization/conservation goals.
  - Number pooling is not an effective or efficient solution for all carriers.
  - USWW, for example, already efficiently utilizes numbering resources.

**NUMBERING OPTIMIZATION (Cont'd)**

- The Commission should maintain other numbering policies that foster competitive neutrality and efficient utilization.
  - Technology-neutral overlays.
  - Ten digit dialing.